

APPENDIX A

NOTICE OF VIOLATION

Consolidated Edison Company  
Indian Point Nuclear Generating Station, Unit 2

Docket No. 50-247  
License No. DPR-26

As a result of the inspection conducted on August 27-31, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

Technical Specification 6.11, "Radiation Protection Program" requires that, "Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure".

- (a) Procedure No. EHS 3.403, "Steam Generator Channel Head Entry", developed pursuant to the above, requires in Section 5.3 that "An SAO-134 will be prepared for the entry of personnel into the Steam Generators". An SAO-134 was prepared for the entry into Steam Generator No. 23 on August 22, 1984, and it required that exposures be recorded for each jumper as the jumper left the Channel Head.

Contrary to the above, on August 22, 1984, a worker, working on Steam Generator No. 23, made four partial and/or full jumps into the generator, and the health physics technician covering the job did not record the workers exposure information after each jump. The technician did not read the worker's special external whole body dosimeters until after the fourth jump, and this resulted in the worker exceeding his quarterly administrative exposure limit of 1250 millirem. The actual dose received during the jumps was 1350 millirem.

- (b) Procedure No. EHS 2.006, "Dissemination of Information Relative to Environmental Health and Safety Procedures", requires that procedures and procedure changes be reviewed with the Radiation Protection Section personnel. Section 2.1.5 of Procedure No. EHS 2.006 states, "A required Reading Acknowledgement Form (Addendum 1) denoting the procedure/revision number and title, the Radiation Protection Section individual's name required to read the procedure, his/her initials indicating awareness and understanding of the procedure contents, and verification by a Radiation Protection Supervisor shall be completed for all new procedures or revisions to procedures".

Contrary to the above, as of August 31, 1984, the licensee did not have a copy of the Reading Acknowledgement Form (EHS 2.006-1, Addendum 1) indicating that the health physics technician covering the Steam Generator job on August 22, 1984, had read and understood the procedure contents of Procedure No. EHS 3.403, "Steam Generator Channel Head Entry".

This is a Severity Level IV violation (Supplement IV).

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Pursuant to the provisions of 10 CFR 2.201, Consolidated Edison Company is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.